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March 2, 2020

Via Electronic Filing

The Honorable Magistrate Judge Steven M. Gold
U.S. District Court Eastern District of New York
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singh v. Lintech Electric, Inc. et al*
Case No.: 1:18-cv-05780-FB-SMGJO

Dear Honorable Magistrate Judge Gold:

This law firm represents Defendants Lintech Electric, Inc. (the “**Company**”), and Linden J. Tudor (“**Mr. Tudor**”, and together with the Company, the “**Defendants**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rule 1(A), this letter respectfully serves as a response to Plaintiff Gursewak Singh’s (the “**Plaintiff**”) letter dated March 2, 2020 [Dckt. No. 51].

On February 6, 2020, Your Honor directed Plaintiff to submit a letter proposing a revised case management schedule, in light of the fact that fact discovery was re-opened for the limited reasons stated on the record during the January 6, 2020 telephonic conference. [*See* Dckt. No. 50].

On Thursday, February 27, 2020 – two (2) business days prior to the March 2 submission deadline – Plaintiff’s counsel emailed the undersigned to obtain comments on his proposed letter. Immediately thereafter, the undersigned informed Plaintiff’s counsel he would provide comments prior to submission. On February 28, 2020, during the pre-motion conference on Defendants’ anticipated motion to dismiss Plaintiff’s state court actions, Plaintiff’s counsel threatened to file his letter unilaterally if he did not receive Defendants’ comments over the weekend.

Rather than waiting to receive comments from my office or requesting an extension of time to file the revised case management schedule (from the date which he had initially requested from the Court), Plaintiff improperly filed his letter unilaterally.

Defendants respectfully request that the Court adopt the following proposed case management plan:

1. Both parties’ Supplemental Document Requests, Interrogatories, and Requests for Admission to be served on or before March 12, 2020;
2. Both parties’ Responses & Objections to Supplemental Document Requests, Interrogatories, and Requests for Admission to be served on or before March 23, 2020;
3. The parties shall be permitted to conduct (1) additional deposition each, which shall be completed on or before April 17, 2020;

4. All supplemental discovery referenced herein & depositions conducted hereinafter shall be limited in scope to the sole issue stated on the record during the January 6, 2020 telephonic conference, *to wit*: Defendant's December 23, 2019 document production containing Plaintiff's cashed checks.
5. Plaintiff will serve his pretrial order portion on April 27, 2020, Defendants will serve their portion on May 11, 2020, and Plaintiff will file the joint pretrial order with the Court on May 18, 2020.
6. The Settlement Conference previously scheduled for March 31, 2020, shall be adjourned to, May 28, 2020. Principals shall be present. Counsel shall have all exhibits identified in the pretrial order available for the Court's review.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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To: All Counsel of Record (via ECF)